

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

FILED/ACCEPTED

FEB 29 2008

Federal Communications Commission
Office of the Secretary

Annual 64.2009(e) CPNI Certification for 2007

Date filed: March 1, 2008

Name of company covered by this certification: Shoreham Telephone Company, Inc.

Form 499 Filer ID: 803256

Name of signatory: James C. Arnold

Title of signatory: Vice President and General Manager

I am a corporate officer of the above Company. Acting as an agent of the Company, I hereby certify that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's (FCC's) rules concerning customer proprietary network information (CPNI), as contained in 47 C.F.R. §§ 64.2001 et seq.

- Attached to this certification is Statement #1 explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.
- As shown in Statement #2, the Company has not taken any actions against data brokers in the past year.
- In Statement #3, we discuss the processes that pretexters are using to attempt to access CPNI.
- In Statement #4, we explain additional procedures that the Company is taking to protect CPNI.
- In Statement #5, we summarize all customer complaints concerning the unauthorized release of CPNI.

I hereby certify that the information contained in this Certificate and the attached Statements is accurate and complete to the best of my ability.

A copy of this Certificate and Statements, but with redactions in Statements 3 and 4, is being filed for public inspection. In addition, this Certificate with unredacted Statements is being filed with a Request for Information to Be Withheld from Public Inspection.

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If you have questions, please contact: Susan Bahr, Esq., Law Offices Of Susan Bahr, PC, PO BOX 2804, Montgomery Village, MD 20886-2804, sbahr@bahrlaw.com, (301) 926-4930.

Name (signature):  _____

Business Address: 3167 Route 22A, Shoreham, VT 05770

Date: February 14, 2008

STATEMENT #1
CPNI PROCEDURES

- 1. To ensure compliance with Section 64.2005 of the FCC's CPNI rules, concerning the use of CPNI without customer approval, the Company employs the following procedures.**

The Company does not market services based on CPNI; thus, it does not use CPNI without customer approval.

- 2. To ensure compliance with Sections 64.2007 and 64.2008 of the FCC's CPNI rules, concerning the use of CPNI with customer approval and the corresponding notices, the Company employs the following procedures.**

The Company does not use, disclose or permit access to CPNI to market services that are not within a category of services to which the customer already subscribes. Thus, the Company does not send notifications or request corresponding approvals from customers. The Company does not use joint venture partners or independent contractors for marketing purposes.

- 3. To ensure compliance with Section 64.2009 of the FCC's CPNI rules, concerning the safeguards for the use of CPNI, the Company employs the following procedures.**

The Company does not use, disclose or permit access to CPNI except in occasional situations during in-bound calls from customers (as discussed below). The Company teaches its employees that they are not to use, disclose or permit access to CPNI in any other situations, and the Company informs the employees of the disciplinary action that would be taken if they breach those rules. This training and education take the form of in-house seminars and webinars. The disciplinary action could be retraining, suspension or dismissal. The Company does not use CPNI for marketing, so it does not need to maintain records of marketing campaigns for purposes of the CPNI rules. We have a supervisory review process regarding compliance with the CPNI rules; and we retain records of compliance as required by the rules.

- 4. To ensure compliance with Section 64.2010 of the FCC's CPNI rules, concerning safeguards for disclosing CPNI, the Company has employed the following procedures ever since Section 64.2010 went into effect.**

Telephone access to call detail information is provided only in accordance with the guidelines established in the CPNI rules. The Company is working with customers to establish passwords and back-up authentication methods, if requested by the customers. Telephone access to non-call detail information is provided after the customer is authenticated. In-store access to CPNI is provided after a customer provides a valid photo ID. The Company does not provide online access to CPNI. The Company has not modified any contracts with business customers to provide alternative authentication regimes. Whenever account information changes as specified in Section 64.2010, the Company immediately notifies the customer, usually via a letter mailed to the existing address of record.

5. To ensure compliance with Section 64.2011 of the FCC's CPNI rules, concerning notifications of security breaches, the Company employs the following procedures.

All staff have been trained in procedures to follow to report breaches internally. We have had no breaches since this rule went into effect. When a breach is confirmed, the appropriate regulatory personnel are prepared to make the required notifications to the United States Secret Service, the Federal Bureau of Investigation, and the customer, as required and permitted under Section 64.2011. Records of such breaches and the corresponding notifications are maintained for at least two years.

STATEMENT #2
ACTIONS AGAINST DATA BROKERS

Proceedings instituted or petitions filed by the Companies at state commissions, in courts or at the FCC against data brokers:

None.

STATEMENT #3
PROCESSES PRETEXTERS ARE USING TO ATTEMPT TO ACCESS CPNI

The image consists of a solid, repeating pattern of the uppercase letter 'X'. The 'X's are rendered in a light gray or off-white color against a slightly darker gray background. They are arranged in a precise grid, with each 'X' centered relative to the others both horizontally and vertically. The pattern is uniform and extends across the entire visible area of the image, creating a textured, woven appearance.

STATEMENT #5
SUMMARY OF CUSTOMER COMPLAINTS CONCERNING THE UNAUTHORIZED
USE OF CPNI

The Company has received no customer complaints about unauthorized use of CPNI. These are summarized below.

	Instances of Improper Access by Employees	Instances of Improper Disclosure to Individuals not Authorized to Receive the Information	Instances of Improper Access to Online Information by Individuals not Authorized to View the Information
# of Complaints Related to Unauthorized Access to CPNI	0	0	NA
# of Complaints Related to Unauthorized Disclosure of CPNI	0 ——	0 ——	NA ——
Subtotal	0 ===	0 ===	NA ===
TOTAL COMPLAINTS		0	

CERTIFICATE OF SERVICE

I, Susan Bahr, hereby certify that on this 29th day of February, 2008, I caused a copy of the foregoing to be sent to:

FCC Enforcement Bureau
Telecommunications Consumers Division
445 12th Street, SW
Washington, DC 20554
(2 copies hand delivered)

Best Copy and Printing, Inc.
445 12th Street, Suite CY-B402
Washington, DC 20554
(via mail)


Susan J. Bahr